



UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

PROJECT VERITAS ACTION FUND,

Plaintiff,

v.

DANIEL F. CONLEY, in his official
capacity as Suffolk County District
Attorney,

Defendant.

C.A. No. 1:16-cv-10462-PBS

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT'S
FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26 and 36, plaintiff Project Veritas Action Fund makes the following supplemental objections and responses to the First Set of Requests for Admission of the defendant District Attorney Daniel F. Conley.

RESPONSES AND SPECIFIC OBJECTIONS TO RFAs

REQUEST FOR ADMISSION NO. 8:

Admit that James O'Keefe narrates, in part or in whole, each of the following videos:

- a. "ACORN San Bernadino [sic] Child Prostitution Investigation Part I," posted to YouTube by veritasvisuals on Sept. 15, 2009,
[https://www.youtube.com/watch?v=7s8w9GEpSzw](https://www.youtube.com/watch?v=7s8w9GEpSzw;);

RESPONSE: Admit.

- b. "ACORN San Bernadino [sic] Child Prostitution Investigation Part II," posted to YouTube by veritasvisuals on Sept. 16, 2009,
<https://www.youtube.com/watch?v=qHY3MHB12ug>;

RESPONSE: Admit.

- c. "ACORN San Bernadino [sic] Child Prostitution Investigation Part III," posted to YouTube by veritasvisuals on Sept. 16, 2009,
<https://www.youtube.com/watch?v=Hr-1rs5IBjA;>

RESPONSE: Admit.

- d. "ACORN San Diego Child Prostitution Smuggling Part I," posted to YouTube by veritasvisuals on Sept. 17, 2009,
<https://www.youtube.com/watch?v=2CMXMC7vba4;>

RESPONSE: Admit.

- e. "ACORN San Diego Child Prostitution Smuggling Part II," posted to YouTube by veritasvisuals on Sept. 17, 2009,
<https://www.youtube.com/watch?v=NwbEPjYqKwI;>

RESPONSE: Admit.

- f. "ACORN Los Angeles Prostitution Investigation - Employee of the Year," posted to YouTube by veritasvisuals on Nov. 16, 2009,
<https://www.youtube.com/watch?v=C5ysz5uaWfw;>

RESPONSE: Admit.

- g. "ACORN: LA Story Program for Torture Victims Part I," posted to YouTube by veritasvisuals on Nov. 19, 2009,
<https://www.youtube.com/watch?v=UciAenIhO2M;>

RESPONSE: Admit.

- h. "ACORN: LA Story Program for Torture Victims Part 2," posted to YouTube by veritasvisuals on Nov. 19, 2009,
<https://www.youtube.com/watch?v=bg0HwXIZmCg;>

RESPONSE: Admit.

- i. "NPR Muslim Brotherhood Investigation Part I," posted to YouTube by veritasvisuals on Mar. 8, 2011,
<https://www.youtube.com/watch?v=xd9OYJMX9t4;>

RESPONSE: Admit.

- j. “Mark Udall Advocates Condone Voter Fraud: ‘That’s not even like lying or stealing,’” posted to YouTube by Project Veritas Action on Oct. 22, 2014, https://www.youtube.com/watch?v=C_uHDjk3fSc;

RESPONSE: Admit.

- k. “Teachers Union President to Kid: ‘I Will Kick Your F***ing Ass,’” posted to YouTube by veritasvisuals on Jun. 28, 2016, <https://www.youtube.com/watch?v=YheNaAEPEv8>; and

RESPONSE: Admit.

- l. “Part I: Undercover investigation exposes groups plotting criminal activity at Trump inauguration,” posted on Jan. 16, 2017, <http://projectveritas.com/2017/01/16/part-i-hidden-camera-investigationuncovers-groups-plotting-violence-at-trump-inauguration/> (cited in paragraph 28 of Your First Amended Complaint).

RESPONSE: Admit. (At the time of this answer, the website address listed here and in the First Amended Complaint was unavailable. The video in question is located at https://www.youtube.com/watch?v=MHZSfhd1X_8.)

REQUEST FOR ADMISSION NO. 12:

Admit that the Robert J. Halderman whom You identify in your Initial Disclosures as Your “Executive Producer” is the same person who, on or about March 9, 2010, pled guilty to, and was convicted of, attempted grand larceny by extortion, in violation of the New York Penal Code, in *People v. Halderman*, Ind. No. 4957/2009 (Supreme Court of New York County, Criminal Term).

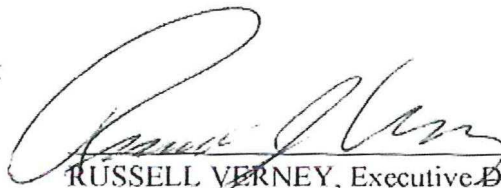
RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 13:

Admit that the James O’Keefe who verified Your First Amended Complaint is the same person who, on or about May 26, 2010, pled guilty to, and was convicted of, entry by false pretenses onto real property of the United States, in violation of the United States Code, in *United States v. O’Keefe*, Criminal Action No. 10-CR-81-SRD-DEK (U.S. District Court for the Eastern District of Louisiana).

RESPONSE: Admit.

As to Responses:



RUSSELL VERNEY, Executive Director, Project
Veritas Action Fund.

January 31, 2018

As to Objections:



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*Counsel for Plaintiff
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January 31, 2018

CERTIFICATE OF SERVICE

I, Stephen R. Klein, hereby certify that on this 31 day of January, 2018, the foregoing Supplemental Responses to Defendant's First Set of Requests for Admission was served by causing a true copy thereof to be mailed by first-class mail, postage prepaid, as well as via electronic mail to Defendant pursuant to mutual agreement by the parties:

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